

POM 1319

Practice Compliance: Prescriber Information

Introduction

Pharmacists are tasked with ensuring the accuracy of the prescriptions that they dispense. This requirement extends not only to quality assurance and patient safety, but also includes accurate inputting of all elements of the prescription, including valid information related to an authorized prescriber.

Prescribers are assigned many different identification numbers and each has a specific purpose and appropriate use. This procedure provides information on the appropriate use of a prescriber's Drug Enforcement Administration registration number or DEA number.

Prescriber Identification

There are many different identification numbers associated with medical practitioners. The most common numbers include:

- National Provider Identification (NPI)
- Drug Enforcement Administration (DEA)
- State-specific licensure or registration

NPI Number

NPI numbers are intended to be used for identifying the prescriber during prescription claim transmissions. The NPI number:

 Is a 10 digit, all numeric number that should be the primary number used to identify the prescriber during claims billing

Example: ######### or 1011111111

- Is issued to each individual practitioner
- Does not require a medical license or registration to obtain; therefore interns and medical residents should each have their own number
- NPI numbers do not expire

Notes: A valid NPI must be used. It is never appropriate to bill claims using a facility's NPI number. Likewise it is never appropriate to use another practitioner's NPI or an invalid NPI number. Inappropriate use of an NPI number may result in discipline, up to and including termination.

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DEA Number

The DEA number is issued by the Drug Enforcement Administration (DEA) to indicate that a prescriber has authority to prescribe controlled substances. The DEA number:

- Indicates and limits a prescriber's authority to prescribe various schedules of controlled substances
- Is a 9-character ID that always starts with 2 letters and ends with 7 numbers

Example: XX####### or FC11111119

- Follows an algorithm that relates to the last number being a 'check digit'
- Is never issued without the practitioner having a valid state license
- Expires every three years

A facility (e.g. teaching hospital) DEA # may be used by medical residents, with an accompanying "suffix" (special internal code), to show authority to practice in that facility and issue controlled substance prescriptions

Notes: A valid DEA number must be used for all controlled substance prescriptions. It is never appropriate to use another practitioner's or an invalid, expired or inactive DEA number; in fact, it is a violation of state and federal law and Wal-Mart policy. A violation of this type will result in discipline up to and including termination.

Controlled
Substance
Prescription
Requirements
Related to
Prescriber DEA
Number

The Code of Federal Regulation (CFR) requires certain information to appear on the face of controlled substance prescriptions in order for them to be valid. These requirements include:

- Date issued
- Patient's full name and address
- Practitioner's full name, address, and DEA number
- Drug name, strength, and dosage form
- Quantity prescribed
- Directions for use
- Refills (if authorized)
- Manual signature of the prescriber

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The DEA number must appear on the face of all controlled substance prescriptions. This includes verbal orders. Pharmacists must record the prescriber's DEA number on the face of the prescription before it is scanned into Connexus. In the event the DEA number printed on the face of the prescription is invalid or incorrect, the pharmacist must follow the steps under "Verification of DEA Number and Prescriptive Authority" below. Once the correct DEA number is identified, the pharmacist must record it on the face of the prescription and assure use of correct DEA number in filling the prescription.

Systems Review

Prescriber information entered into Connexus must be accurate and accurately reflect information provided on the hard copy prescription. If the information on the hard copy prescription is insufficient or incorrect, the pharmacist must call the prescriber for clarification and document any clarification on the hard copy prescription.

Pharmacists are responsible for the accurate filling of prescriptions, including the accuracy of information associated with the prescription and submitted for third party claims billing and to state and/or federal agencies.

In order to meet this obligation it is important to understand how the Connexus prescriber file functions and the tools that are available to assist in accurately inputting and verifying information.

Prescriber Database

Prescriber profiles are downloaded from a vendor-purchased file. Because there is a lag time between file updates, there may be times when a legitimate prescriber's information does not appear in the database. Additionally, the database does not include facility information, so teaching facilities that authorize medical residents to prescribe controlled substances using the facility DEA number will never appear in the database.

For these reasons, pharmacists may at times need to add prescribers into the Connexus system. Pharmacy added prescriber profiles (those added at the local level) expire in 7 days; 30 days if the prescriber is added as a resident prescriber utilizing a facility DEA number (and the box for resident is checked).

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Adding a Prescriber to Connexus

These steps must be followed before adding a prescriber into Connexus. The inputting technician must first check the HOST system for the prescriber record.

Step	Action Required
1	Input either the prescriber's name or DEA number and click the search button. All available prescribers matching the search criteria will appear.
2	Select the appropriate prescriber if the prescriber appears in the search results.
Note:	The DEA number on the hardcopy and the DEA number selected at input must match. Additionally, the address selected from the drop down menu at input must match the hardcopy prescription.
3	If the prescriber is not returned in the search results, conduct a "Host Look Up" to search the larger central database.
4	Select the appropriate prescriber if the prescriber appears in the search results.

If the prescriber does not appear in the search results and the prescription is for a controlled substance, the DEA number and level of prescriptive authority must be verified before entering the prescriber into Connexus. The prescription may not be filled until the DEA number and level of prescriptive authority are verified.

Note: Prescriber DEA numbers do expire. You must follow the next steps to verify the DEA number.

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Verification of DEA number and prescriptive authority

Step	Action Required
1	Verify the DEA number and level of prescriptive authority on the HMS website and the DEA validation website
	<u>HMS Website</u> : WIRE > Knowledge Center > Business Support > Insurance/H&W Contact Center > Prescriber Store Identifiers (NPI-DEA) Lists & Tools > NPI and DEA Prescriber Look up
	<u>DEA Validation Website</u> : WIRE > Knowledge Center > Business Support > Insurance/H&W Contact Center > Prescriber Store Identifiers (NPI-DEA) Lists & Tools > DEA Registration Validation
2	If the prescriber is using a facility DEA number (for example, a resident), the DEA number will not be in the HMS website. Use the DEA Registration Validation website to validate the facility DEA number.
3	Once the DEA number and prescriptive authority has been validated, <u>click here</u> for directions on adding a prescriber into Connexus.

Validating the DEA Number

Pharmacists must verify that the DEA number selected at input matches the DEA number on the face of the hardcopy prescription. At the 4-point check screen pharmacists can reroute any input inaccuracy, including the prescriber or the prescriber's DEA number.

Conclusion

Pharmacists are responsible for the accuracy of all information entered into Connexus. Questions on this guidance can be directed to Health and Wellness Practice Compliance.